

EXHIBIT P

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF TIMOTHY DUFFY

I, TIMOTHY DUFFY, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I was a firefighter for the New York City Fire Department (FDNY).

4. At the time of the 9/11 attacks at the World Trade Center, I had finished my prior shift with the FDNY, and I was not scheduled to work. However, after the passenger jets crashed into the North and South Towers, I could actually see the smoke billowing from the Towers from my home. I then received a call from the FDNY to come to the World Trade Center area as quickly as possible.

5. So that I could get to my firehouse and then the World Trade Center area as quickly as possible, I traveled from my home on my Harley-Davidson motorcycle, which allowed me to weave through the traffic towards the downtown area of New York City. As I approached the World Trade Center, I traveled through a cloud of thick dust and debris related to the prior collapse of the South Tower. Attached as Exhibit B to this Declaration is a true and correct copy of an article published on the internet on September 11, 2015, which includes a photo taken on 9/11 as I rode my motorcycle towards the World Trade Center area.

6. Less than a minute after I arrived to rescue civilians in the area that would later become known as Ground Zero, the North Tower collapsed and I was partially buried beneath the rubble. I was somehow able to crawl on my hands and knees out from under the pile of concrete and building debris which had buried me. Due to the falling debris, I injured my head, neck, and back. Glass within the falling debris also struck me in both of my eyes. Lastly, I inhaled large quantities of dust, chemicals, and inhalants in the debris cloud that followed the collapse of the World Trade Center towers.

7. Despite my injuries, I crawled up the steps of One Liberty Plaza to get under the overhang. Another nearby building then collapsed, and the rush of air it caused actually propelled me up the steps of One Liberty Plaza. At that point, I grabbed a building pillar to anchor myself to the area so I could avoid further injury from the collapse of the structures around me. The debris cloud that surrounded me actually became so thick that I felt like I was unable to breathe or take in oxygen to my lungs.

8. Once I had assessed the destruction around me, I crawled into the Brooks Brothers store where I began to assist others who had been injured. Despite my own injuries and my experiences during these horrific terrorist attacks, I remained focused on helping the injured. I

then located a pickup truck near my location, which I used to transport several victims away from Ground Zero to Beekman Hospital.

9. Finally, after having rescued several victims from these horrific terror attacks, I sought treatment for my own physical injuries as referenced above at Staten Island University Hospital. I didn't arrive at the hospital until approximately 2:00 A.M. on September 12, 2001. In the course of these attacks and my efforts to rescue victims and protect the innocent, I witnessed unspeakable atrocities beyond the imagination of the average citizen. The scene at Ground Zero and the surrounding areas could only be compared to a war zone.

10. As a result of these terrorist attacks, I suffered the following confirmed injuries: significant pain and head trauma from falling debris that resulted in concussion syndrome, severe headaches, and vertigo that continue through the present; back and neck contusions; and glass in my eyes. Due to the large quantities of debris, fumes, and other inhalants that I consumed and to which I was exposed on 9/11 as referenced above, I suffered and continue to suffer from the following confirmed and diagnosed conditions: squamous cell carcinoma on my chest; asthma; chronic respiratory disorder; chronic rhinosinusitis; GERD with associated sleep apnea; chronic bronchitis; and psoriatic arthritis. Further, I have been deemed totally disabled by the New York City Fire Department as a result of my chronic respiratory disorder and associated conditions that I acquired as a result of the above events.

11. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events. I have been diagnosed with a major depressive disorder with recurrence for which I sought and continue to seek treatment. The horrific events that I witnessed on 9/11 directly caused all of the above mental health conditions which continue to this day.

12. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following these September 11, 2001, terrorist attacks.

13. I previously pursued a claim through the September 11th Victim Compensation Fund (VCF Number Unknown) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 29 day of January 2021.


TIMOTHY DUFFY

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**